

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BARRY MEHLER,

Plaintiff,

v.

FERRIS STATE UNIVERSITY, et al.

Defendants

Case No. 1:22-cv-71

Hon. Jane M. Beckering

DECLARATION OF NATHAN NELSON, Ph. D.

Pursuant to 28 U.S.C. § 1746, Nathan Nelson hereby states the following:

1. My name is Nathan Nelson.
2. I am an adult resident of the State of Michigan.
3. I make this declaration upon my personal knowledge unless specifically identified otherwise.
4. I am an adjunct instructor at Ferris State University (“FSU” or the “University”). I have been an instructor at FSU since 1998. As an adjunct professor, I work for the University on a year-to-year contract.
5. I earned my Bachelor of Arts Degree in English from Alma College. I earned by Master of Arts Degree in English and my Doctorate in English, medieval period, from The University of Tennessee.
6. Beginning by July of 2021, I was investigated by FSU for an alleged violation of the University’s Employee and Student Dignity policy along with its Harassment and

Discrimination Policies. This 2021 investigation involved two Facebook posts that I made in January 2016.

7. The investigation lasted approximately three months. I was notified of the investigation via an extremely aggressive email on July 1, 2021 by Miles Postema. I have never met nor seen Miles Postema. I do not know him, and he does not know me. I attended an interview with University investigator Brett Schuelke on August 10, 2021. FSU issued its “Investigative Findings and Conclusions” to me on October 6, 2021.

8. A true and accurate copy of the “Investigative Findings and Conclusions” (the “Investigative Findings”) is attached hereto as **Exhibit 1**.

9. Following the investigation, in mid-November 2021, I spoke with Dr. Randy Cagle, Dean of the College of Arts, Sciences, and Education, to which my department (English, Literature, and World Languages) belongs. At that time, I still did not know what if any discipline would be imposed on me. I told him that it was nearing five months along and that I wanted closure on the case. We later agreed to meet on November 29, 2021, the Monday after Thanksgiving.

10. On November 29, 2021, I met with Dean Cagle, along with a union representative and my legal counsel. Dean Cagle stated that he did not see any ill intent on my part regarding the matters discussed in the Investigative Findings. Dean Cagle proposed and I ultimately agreed to a resolution that avoided any formal discipline by the University. I did not want any formal discipline in my employment file with the University that FSU might use against me in the future.

11. Personally, I was and am deeply disturbed and offended by FSU’s investigation of me. I was never told who “reported” my Facebook postings to the university. Per contract, no investigation may be based solely upon an anonymous complaint, but it proceeded nonetheless. I suspected that the University would use the investigation as a pretext to

terminate or to not renew my contract. This continued for months, from July to November of 2021. I wondered whether at any time I could be told that my contract was terminated or would not be renewed the following year.

12. I continue to vehemently dispute the conclusion in the Investigative Findings that I violated FSU's Employee and Student Dignity policy (the "ESD Policy"). The ESD Policy specifically states that to be a violation of the policy, the conduct must "because of its severity or persistence, significantly interfere with an individual's work or education." Viewed objectively, the allegations against me, *even if true*, could not possibly meet that standard. The report itself merely states that my conduct "could contribute to creating a hostile or intimidating environment" or "could" cause some students to feel unwelcome in my class. That is very different than conduct that causes a hostile environment due to its "severity or persistence."

13. The Investigative Findings faulted me for not being able to explain, in 2021, the reasoning behind having made two innocuous Facebook posts in January of 2016. It appears to me the posts were interpreted in the worst possible light. This is despite the fact that I presented the investigators with copies of the Quran – a book I have read from cover to cover – that were gifted to me by international students who enjoyed my ability to discuss the book with them, including the differences between the Bible and the Quran.


14. It is my belief that my Facebook page was reported to the University because somebody did not like my beliefs or politics. My Facebook page includes posts about my Christian faith and my conservative political views. Someone took the time to scroll through over five years of my Facebook history to find something to report to the University; his or her motivation is certainly suspect.

15. As a result, I had to endure an investigation and months of uncertainty about my future at FSU.

16. As a result of the investigation over whether I violated FSU's ESD Policy, I have found myself considering how circumscribed First Amendment rights are at Ferris. Anything that anyone could take as subjectively offensive could lead to another misguided investigation with false conclusions. Neither I nor my colleagues should be subject to such an unjust experience.

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on March 3, 2022

DocuSigned by:

8F440FD183084BD...
Nathan K. Nelson

**FERRIS STATE UNIVERSITY
OFFICE OF EQUAL OPPORTUNITY**

INVESTIGATIVE FINDINGS AND CONCLUSIONS

INVESTIGATOR: Brett T. Schuelke, Staff Attorney

DATE: October 6, 2021

RESPONDENT: Nathan Nelson, Adjunct Instructor Level 3

CONFIDENTIAL**SUMMARY OF ALLEGATIONS**

The University initiated an investigation in July 2021 after an anonymous complaint alleged that posts on Professor Nathan Nelson's ("Nelson" or "Respondent") Facebook profile were disturbing, offensive, and inappropriate. Brett Schuelke ("Schuelke"), Staff Attorney, reviewed Nelson's publicly available Facebook account and verified two Facebook posts that included potentially discriminatory comments regarding a group of students with Arabic names in January of 2016 (Exhibits 1 and 2).

The complaint also identified other Facebook posts stating personal opinions on religious and political matters, but which did not reference University students. The University focused this investigation on posts that specifically referenced students with comments reflecting protected statuses.

INVESTIGATION**Respondent, N. Nelson**

On August 10, 2021, Schuelke conducted an in-person interview with Nelson. Also present were Matthew Hoffer, an attorney for Nelson; Mary Bacon, Nelson's union representative; and Kylie Piette, Director of Equal Opportunity.

Nelson is an adjunct professor in the English, Literature, and World Languages Department within the College of Arts, Sciences & Education. He primarily teaches English (ENGL) 150, 250, and 321, and he teaches around five to six sections of these courses per semester.

Nelson stated that Facebook is currently the only social media platform he uses. Nelson claimed that his Facebook account is mostly private and only available to friends, but admitted that some posts are public. Nelson could not explain which types of posts are public or private but indicated that typically posts about family would be private.

Nelson explained that he occasionally posts about his work at the University. In addition, Nelson will feature students in posts when they finish school. These are posted with the student's permission at the end of the semester and include details such as their first name, hometown, and major. Nelson claimed he does not discuss specific students or disclose student names on Facebook other than the end of the semester posts described above.

January 11, 2016 Facebook Post

When asked about the January 11, 2016 Facebook post (Exhibit 1) stating "This spring term I have an **Student 101** a **Student 102** and three **Student 103** I have pitched the syllabus and opted to cover A Thousand and One Arabian Nights. Cue Scheherazade", Nelson did not deny making the post but could or would not provide a reason for why he made the post. Nelson did not recall any specifics related to these students or their courses with him. He did not recall the courses he taught in Spring 2016, except that it was either ENGL 150, 250, or 321. Nelson explained that he has not taught ENGL 321 in at least five years though.

Nelson indicated that "One Thousand and One Arabian Nights" and Scheherazade may be topics covered in ENGL 150 or 250, though they may not be covered in every semester of ENGL 250. He did not remember if he covered these topics in Spring 2016. Nelson stated he

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covers these topics because Scheherazade is an excellent narrator, and the book is an example of good writing and, occasionally, bad writing. When asked why he connected a group of students with Arabic names with this story and character, Nelson responded that he could only speculate due to the passage of time. Nelson also did not recall why he commented that he was going to pitch the syllabus because of this group of students, and clarified that he did not pitch any syllabi that semester since, generally, he has to submit them before the start of each semester before he receives class rosters.

January 13, 2016 Facebook Post

Nelson did not deny making the January 13, 2016 Facebook post (Exhibit 2) where he stated, "All three [Student 103] have disappeared from my rolls. Pilgrimage[?]", but could or would not provide a reason for why he made the post. Nelson stated he typically does not mention students who drop his courses in Facebook posts, and this must have been an exception. Nelson said he does occasionally make posts complaining that it is harder to keep track of names because of slight variations in spelling. When asked what he meant by "Pilgrimage[?]" concerning three [Student 103] dropping his course, Nelson stated that a pilgrimage is going to holy sites in "Arabia". Nelson said he would think that's what his comment was alluding to since Arabia is the destination for a pilgrimage, but he did not remember.

Nelson stated he believed that the University's response to the posts has been "overblown" and that someone went "nuclear" over posts that are not disparaging. He indicated that he did not have any expectation of reaction to the posts. He noted that commenters on the January 11 post (Exhibit 1) were a colleague and a student, and claimed that students who knew him would not object to the posts.

When asked when he last took anti-harassment/non-discrimination training, Nelson stated that he has never taken or attended such training since no one ever suggested he needed it. He also indicated he was not familiar with the University's Family Educational Rights and Privacy Act ("FERPA") policy and did not recall having taken any FERPA training.

At the end of the interview, Nelson presented two copies of the Quran he brought from his office that were gifts from international students. Nelson also noted his work with the Teaching of English as a Foreign Language program at the conclusion of the interview.

Additional Investigation:

Nelson's course schedule for Spring 2016 shows he taught four sections of ENGL 250 (Exhibit 3). Two students with the names [Student 102] and [Student 101] were enrolled in Nelson's ENGL 250, Section 026 (Exhibit 4), both of whom received grades below a C for the course. The class rosters do not list anyone with the name [Student 103] consistent with the fact that these students dropped the course on or before January 13, 2016, two days into the semester (Exhibits 4 and 5).

FINDINGS AND ANALYSIS

The University's Employee and Student Dignity/Harassment/Discrimination policies prohibit actions that "harass, discriminate, or otherwise create a hostile environment for students, faculty, and staff." The expectation outlined in the Employee and Student Dignity policy is that "students and employees conduct themselves with dignity and respect for students, employees,

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and others. It is each individual's responsibility to behave in a civil manner and to make responsible choices about the manner in which they conduct themselves." These policies are further modeled after state and federal civil rights law. The Employee and Student Dignity Policy defines harassment as "the creation of a hostile or intimidating environment in which verbal or physical conduct, because of its severity or persistence, is likely to significantly interfere with an individuals' work or learning environment."

During the investigation interview, Nelson's statements demonstrate a lack of training and understanding of his professional responsibilities as a University professor. Nelson acknowledged that he made the two January 2016 Facebook posts (Exhibits 1 and 2), but could not explain why he connected these names with One Thousand and One Arabian Nights, Scheherazade, or referencing pilgrimage. The posts appear to serve no purpose other than to reflect a stereotype. At no time did Nelson offer a plausible explanation for the posts that would dispute the belief that the posts were made in a way that violates the Employee and Student Dignity policy. Further, Nelson did not recognize during his interview that the posts were unprofessional and did not display dignity or respect for his students.

The posts could contribute to creating a hostile or intimidating environment for students of Arabic heritage and/or Muslim religion, in violation of University policy. The posts could further cause students to believe students of Arabic descent or Muslim religion are unwelcome in Nelson's classes.

Instead of recognizing that the posts were not appropriate for a public Facebook page where he also mentions his University affiliation, Nelson attempts to avoid this by blaming the University for over-reacting. Nelson did not or does not recognize that posts referencing students with Arabic names in the manner he did may support a claim that Nelson creates a hostile environment for students with related protected statuses. Additionally, posts reflecting a stereotype based on a protected status undermine the presumption that a professor's grading is nondiscriminatory, particularly where here, the comments were posted at the commencement of the course. At a minimum, the two Facebook posts do not reflect the professional commentary expected of a faculty member teaching a diverse community of students.

Moreover, when asked when he last took anti-harassment/non-discrimination training, Nelson stated he had not taken any during his time at the University because no one suggested he needed it. In addition, Nelson also acknowledged not being familiar with FERPA and the University's FERPA policy, which prohibits the disclosure of student information in the University's records. Nelson disclosed the information from the University's enrollment records for his course that these students were enrolled in one of his Spring 2016 courses, and, then three students named **Student 103** had withdrawn from his class. The students' full names and the course they were enrolled in/withdrew from (i.e. ENGL 250) could have been identified from the University's directory webpage and Nelson's publicly posted University schedule. Professor Nelson's lack of understanding or familiarization with FERPA is not a reasonable explanation for conduct that could violate FERPA and the University policies he is subject to as a University employee.

The University acknowledges that the posts in question date back to 2016; however, the University first became aware of them in July 2021, and the University's policies do not prescribe a time limitation that prohibits it from addressing alleged violations once it becomes aware of them. Although there have not been any intervening posts that reflect an ongoing animus towards Arabic or Muslim students, the two posts are accessible on Nelson's Facebook account as evidenced by this reviewer's initial verification of the posts on his account, and still

are as of September 2021.

CONCLUSION

The investigation concludes that Nelson's posts violate University policies, including the Non-Discrimination and Employee and Student Dignity policies.

**Nathan Nelson
NT 10097-21**

EXHIBIT LIST

- Exhibit 1: January 11, 2016 Facebook post.
- Exhibit 2: January 13, 2016 Facebook post.
- Exhibit 3: Nelson's 2016 spring semester course schedule.
- Exhibit 4: Nelson's Spring 2016 ENGL 250, Section 026 class roster.
- Exhibit 5: Nelson's Spring 2016 ENGL 250, Sections 025, 027, and 028 class rosters.

Exhibit 1



Nathan Karl Nelson

January 11, 2016 · 🌐

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This spring term I have an Student 101, a Student 102, and three Student 103. I have pitched the syllabus and opted to cover A Thousand and One Arabian Nights. Cue Scheherazade.



6

2 Comments

Share



Anthony Godinez

3

Student 103 !



1

5y



Caroline Stern

Each of my English 311 classes has half of the seats filled with international students. They require more work because they are thinking in translation, but they are so worth it. I get to travel the world without leaving home. I love to learn from th... See More

5y



2

Exhibit 2



Nathan Karl Nelson

January 13, 2016 · 🌐

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...

All three [Student 103] have disappeared from my rolls.
Pilgrimage?



5

1 Comment



Share



Anthony Godinez

Listen to this, my wife bought a car from a guy who claimed he was Greek and name was Sam. His id said his name was [Student 103]. He demanded cash not check. She owed him 500 but he said she could pay him after he returns from Saudi. Then when he came back she asked how his trip to Saudi was, and he said that he never said he was going there, but instead went to Russia. Then his email said his name was omar. Maybe we were paranoid for thinking this all seemed suspicious. She reported the activity anyways. Basically the officials said that this is normal behavior. Maybe it is, but after san bernardino you would think they would at least check it out and not just disregard it so easily.

5y · Edited

EXHIBIT

Exhibit 3

Look Up Classes

Spring 2016, Jan 11- May 6
Aug 31, 2021 04:21 pm

Select the box in front of the CRN (C identifies a closed class) and choose Register or Add to Worksheet. If the course has a Waitlist option and you wish to add yourself to the Waitlist, take note of the CRN and add it to your Add/Drop Classes worksheet. After you attempt to add the course you will be provided the error that the section is full and given the option to Waitlist.

Sections Found

English																			
Select	CRN	Subj	Crse	Sec	Comp	Cred	Title	Days	Time	Cap	Act	Rem	WL	WL	WL	Instructor	Date (MM/DD)	Location	Attribute
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NR	10566	ENGL	250	025	M	3.000	English 2	MWF	08:00 am-08:50 am	23	22	1	15	0	15	Nathan K Nelson (P.)	01/11-04/29	SCI 132	Big Rapids Campus and Communication Competence and Big Rapids Tuition**
NR	10568	ENGL	250	026	M	3.000	English 2	MWF	09:00 am-09:50 am	23	22	1	15	0	15	Nathan K Nelson (P.)	01/11-04/29	SCI 132	Big Rapids Campus and Communication Competence and Big Rapids Tuition**
NR	10569	ENGL	250	027	M	3.000	English 2	MWF	10:00 am-10:50 am	23	21	2	15	1	14	Nathan K Nelson (P.)	01/11-04/29	SCI 132	Big Rapids Campus and Communication Competence and Big Rapids Tuition**
C	10571	ENGL	250	028	M	3.000	English 2	MWF	01:00 pm-01:50 pm	23	23	0	15	0	15	Nathan K Nelson (P.)	01/11-04/29	SCI 132	Big Rapids Campus and Communication Competence and Big Rapids Tuition**

Exhibit 4

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Summary Class List

Spring 2016, Jan 11- May
6 Aug 20, 2021 09:19 am

An asterisk will appear next to the appropriate field if any of the following conditions exist: 1) The student has more than one major or department in his/her primary or secondary curriculum. 2) The student has a program, level, college, or degree in the secondary curriculum that is different from that in his/her primary curriculum.

~ Per University policy a student can select the use of a preferred first name (PFN). As available this PFN will appear in accordance to the policy. If not available or not in accordance to policy the legal name will appear. If you have any questions regarding any inconsistencies please contact the Registrar's Office.

If the word Confidential appears next to a student's name, the personal information is to be kept confidential.

Course Information

English 2 - ENGL 250 026

CRN: 10568

Duration: Jan 11, 2016 - Apr 29, 2016

Status: Active

Enrollment Counts

Maximum Actual Remaining

Enrollment: 23 22 1

Cross List: 0 0 0

Summary Class List

Record Number	Student Name	ID	Reg Status	Level	Credits	Midterm	Final	Grade Detail
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Nelson Dec.

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Exhibit 5

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Summary Class List

Spring 2016, Jan 11- May
6 Aug 20, 2021 09:17 am

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~ Per University policy a student can select the use of a preferred first name (PFN). As available this PFN will appear in accordance to the policy. If not available or not in accordance to policy the legal name will appear. If you have any questions regarding any inconsistencies please contact the Registrar's Office.

If the word Confidential appears next to a student's name, the personal information is to be kept confidential.

Course Information

English 2 - ENGL 250 025

CRN: 10566

Duration: Jan 11, 2016 - Apr 29, 2016

Status: Active

Enrollment Counts

Maximum Actual Remaining

Enrollment: 23 22 1
Cross List: 0 0 0

Summary Class List

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Summary Class List

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Spring 2016, Jan 11- May
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If the word Confidential appears next to a student's name, the personal information is to be kept confidential.

Course Information

English 2 - ENGL 250 027

CRN: 10569

Duration: Jan 11, 2016 - Apr 29, 2016

Status: Active

Enrollment Counts

Maximum Actual Remaining

Enrollment: 23 21 2
Wait List: 15 1 14
Cross List: 0 0 0

Summary Class List

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Summary Class List

Spring 2016, Jan 11- May
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If the word Confidential appears next to a student's name, the personal information is to be kept confidential.

Course Information

English 2 - ENGL 250 028

CRN: 10571

Duration: Jan 11, 2016 - Apr 29, 2016

Status: Active

Enrollment Counts

Maximum Actual Remaining

Enrollment: 23 23 0

Cross List: 0 0 0

Summary Class List

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CERTIFICATE OF SERVICE

I certify that on March 4, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF/CMF system, which will send notification of such filing to all counsel of record.

/s/Zachary M. Youngsma

Zachary M. Youngsma (MI P84148)

SHAFFER & ASSOCIATES, P.C.